

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

MDL No. 1570
ECF Case

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THOMAS BURNETT, SR., *et al.*

03 CV 9849 (RCC)

Plaintiffs

- against -

AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*,

Defendants.

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**DECLARATION OF INGRID L. MOLL IN OPPOSITION TO DEFENDANT INTERNATIONAL
ISLAMIC RELIEF ORGANIZATION'S MOTION TO DISMISS THE THIRD AMENDED
CONSOLIDATED MASTER COMPLAINT**

INGRID L. MOLL declares under penalty of perjury:

1. I am an attorney admitted to practice before this Court and am associated with Motley Rice LLC, co-counsel for plaintiffs in *Burnett v. Al Baraka Investment & Development Corp.*, Civil Action No. 03 CV 9849. I submit this declaration to provide the Court with the exhibits on which plaintiffs rely in their opposition to Defendant International Islamic Relief Organization's Motion to Dismiss the Third Amended Consolidated Master Complaint.

2. Exhibit A is true and accurate copy of an International Islamic Relief Organization memorandum, entitled "An Extremely Urgent Appeal [sic] from IRO in Bosnia-Herzegovina," authored by Executive Director Sulaiman A. Al-Ali.

3. Exhibit B is a true and accurate copy of pages from the Muslim World

League website as it appeared on May 14, 2004.

4. Exhibit C is a true and accurate copy of a page from the website of the State of Virginia, State Corporation Commission as it appeared on May 14, 2004.

5. Exhibit D is a true and accurate copy of the 1992 Return of Organization Exempt from Income Tax filed by International Relief Organization.

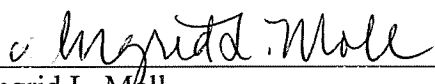
6. Exhibit E is a true and accurate copy of the corporate record and business registration of International Relief Organization, Inc. downloaded from and available on Westlaw.

7. Exhibit F is a true and accurate copy of the corporate record and business registration of International Islamic Relief Organization, Inc. downloaded from and available on Westlaw.

8. Exhibit G is a true and accurate copy of Report of Investigation, Interview of Soliman Biheiri, Department of the Treasury, United States Customs Service, Case No. DC02PU02DC0005; July 14, 2003.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2004.



Ingrid L. Moll